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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtors.

Chapter 11

Case No. 08-13555 (SCC)

Jointly Administered

**JOINDER OF CITIGROUP GLOBAL MARKETS INC. TO OBJECTION OF
DEUTSCHE BANK AG, LONDON BRANCH TO MOTION OF THE PLAN
ADMINISTRATOR FOR AN ORDER IN AID OF EXECUTION OF THE PLAN**

Citigroup Global Markets Inc. (“CGMI”), by and through its undersigned counsel, hereby joins in the objection filed on January 17, 2018 [Doc. No. 57490] (the “Objection”) by Deutsche Bank AG, London Branch (“Deutsche Bank”) to the Plan Administrator’s *Motion for an Order in Aid of Execution of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors* filed on November 21, 2017 [Doc. No. 57036] (the “Motion”),¹ and respectfully represents as follows:

1. Like Deutsche Bank, CGMI holds ECAPS issued by certain of the Partnerships.
2. CGMI hereby adopts and incorporates all of the arguments raised in the Objection as if such arguments were set forth herein and asserted by CGMI. As Deutsche Bank correctly argues in the Objection, the relief requested in the Motion is prohibited by, among other things, the plain language of the confirmed Plan and applicable bankruptcy law.

¹ Capitalized terms not defined herein have the meanings given to them in the Motion. On January 12, 2018, the Plan Administrator agreed to extend CGMI’s objection deadline to January 31, 2018.

3. CGMI reserves all rights to be heard before the Court with regard to the issues raised in the Objection and this Joinder. CGMI reserves all of its right and remedies, and nothing contained in this Joinder shall constitute an admission by CGMI for any other purpose or a waiver of any rights or remedies available to CGMI.

WHEREFORE, CGMI joins in Deutsche Bank's Objection and respectfully requests that this Court deny the Motion in its entirety.

Dated: January 30, 2018
New York, New York

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Kyle J. Kimpler

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